

EXHIBIT 6

DECLARATION OF R.B.

I, R.B., declare and state the following:

1. I am 18 years old. I am currently living in Corpus Christi, Texas, with my mom.
2. I am originally from Guatemala, but I came to the United States with my mom when I was young.
3. When I was 13, I got picked up by immigration authorities. I had run away from home and I was living in Rio Grande City at the time.
4. I stayed in a sorting facility for one night, and then I was sent to Nueva Esperanza, a staff secure facility in Brownsville, Texas. From there I was moved to a juvenile facility in Newark, New Jersey. I stayed there for about two months, but I started losing it. I was sad because I hadn't seen my mom in a long time. I had a lot of anger problems, and it was really hard.
5. I told the guards I wanted to hurt myself, and they sent me to Sandy Pines, a hospital in West Palm Beach, Florida. The guards at Newark told me they were sending me away because I needed help, and they didn't have the right resources there.
6. A few months later, I was sent to Shenandoah because of behavioral problems. I lit a piece of toilet paper on fire using lead from a pencil. I burned it in the sink, right under the faucet, and I put it out in a matter of seconds. I wasn't trying to start something, I was just showing off. I also got into a fight with my roommate that night. Two or three days later, they told me I was being transferred. They didn't tell me where I was going. I was 14 at the time.
7. I was at Shenandoah for a little over three months. After being there for two months, I escaped while I was being transported to a doctor's office. I was so sad, I felt worthless

and I didn't feel like I had anything to live for. In Shenandoah, they locked me in a room that was 8x10, or maybe 8x16, for 23 hours a day, all by myself. It's not good for a person to be isolated that long. I started talking to myself.

8. I wasn't myself after that. When I left home I was just a little boy, but being there changed me. I'm not optimistic any more. Even now, my mom tells me that I changed a lot, that I'm not the same person. I rarely go out with friends. I just spend time with my family now.
9. When I was at Shenandoah, at least once a week, I had to fight – with a guard, another kid, or anybody who wanted to fight me – because I was so angry. They didn't tell me anything about what was going on with my case or when I was going to leave. Not knowing anything month after month drove me crazy.
10. When I got in fights, the guards at Shenandoah would grab my arms and put them behind my back. They would cross my elbows and put pressure on them. Then they would fold my knees and push me down. It hurt, so I fought back to relieve the pressure. I told them, "If you just let me go a little bit, I'll calm down," but they wouldn't do it.
11. When they couldn't get one of the kids to calm down, the guards would put us in a chair – a safety chair, I don't know what they call it – but they would just put us in there all day. This happened to me, and I saw it happen to others too. It was excessive.
12. At other detention facilities where I had been, the staff would treat us differently when we were angry. They would tell me to calm down and then slowly let me go, and then they would take me to my room so I could punch a wall or something. The guards at Shenandoah would say, "calm down, calm down" and I would say "I just got punched in the face, why you want me to calm down?" And then they would put me in the chair.

13. I was put in this chair 4-6 times I guess. The longest time I was in it was probably half a day, or two shifts. I was really mad that time. I was young, I had a lot of problems.
14. The chair is painful. Imagine a little rocking chair with straps for your head, elbows, legs, feet; you could turn your head a little from side to side, but you can barely move it in. It's a metal chair that has two little wheels in the back, so they can lean it back and transfer it, like a dolly.
15. This is embarrassing, but on one occasion, I had to pee, and they wouldn't let me, so I just went on myself. I know one or two other kids this happened to as well; they peed on themselves while they were in the chair.
16. One time they put a mask on my face because I spit on the guard when I was strapped down. I know now that was bad, but you have to understand there was nothing you could do, except move your head back and forth, while you were in the chair. The mask is like a white veil I guess, or a net for your hair – it has a million little holes in it. You can see through it and breathe through it.
17. I also got placed on room restriction a lot. If me and another minor got into a fight, they'd put us on room restriction for 3, 4, 5 days at a time. When you were on room restriction, when they woke you up at 6 or 7 am, they'd take your mattress away, and wouldn't give it back until room checks at the end of the day. They would leave you in your room with nothing but a book and a Bible, but no mattress – so you can't sleep, because you would just be laying on the concrete. I started talking to myself and banging my head against the wall. I felt like I was going crazy, and I would do anything to get the guard's attention.

18. The guards never picked fights with me, but I saw it happen with other kids. They would say things to them and challenge them until the kids got really mad and fought back. Then the kids would push the guard, and then the guard would grab both of the kid's arms and try to force them into a restraint. The guards were twice the size of the kids, who were 13 or 14 years old, but they would use their full weight to push them to the ground. Sometimes it was two guards doing this to a little kid.
19. Before I was at Shenandoah, I had been diagnosed with ADHD and prescribed medications for it, but that was it. When I came to Shenandoah, they told me I had bipolar disorder and PTSD. At first I didn't even take medicine, but they made me think I needed it – sleeping pills, Seroquel, and a bunch of others. They keep you drugged there.
20. Now I just take melatonin to help me sleep, nothing else. I don't need any anti-psychotic drugs.
21. I declare, under penalty of perjury, that all the information I have provided here is true and correct to the best of my knowledge, and I am aware of the legal consequences of making a false declaration.

Executed this 8th day of January, 2018, in Corpus Christi, Texas

R.B.